

I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates. The newspaper/broadcast

cross-ownership cap is a crucial element of our democratic media, and it should not be weakened.

The presumption in the proposed rule(s) is that somehow greater efficiencies can be preserved for both broadcast and newspaper outlets by allowing such combinations and that the so-called multiplicity of media outlets justifies such allowances. There is no such thing as multiple voices anymore.

In fact, newspapers themselves are monopolies in all but a handful of very large cities and, as such, are powerful voices unto themselves in the areas they serve. They need no ownership rule change to wield their considerable weight and power. It is most likely that broadcast facilities in those same areas are the ONLY competition for editorial and advertising publishing.

Even in markets where cable is present, the penetration rates remain low - certainly low enough not to be considered serious contention for either the local advertising dollar or the viewers/readers of the SMSA. And the programming choices are few in cable, almost none of them accessible by local viewers.

The newspaper-broadcast prohibition is one of the rare vestiges of regulatory effectiveness to keep multiple voices alive in most markets. To add elimination of this rule to the record of rules that have already removed basic protections (for the public interest, convenience and necessity in broadcast ownership and operation) by allowing multiple broadcast ownership in single markets would effectively undermine the very foundations of the First Amendment and the fundamental rules of capitalist enterprise by actually creating, not preventing, media monopolies in this already fragile economy.

Thus, this becomes a matter of anti-trust as much as multiple voice preservation. Adding newspaper ownership, for instance, to a broadcast market like Minneapolis-St. Paul already now dominated by multiple broadcast owners (Clear Channel Communications alone owns six Twin Cities radio stations and the largest billboard company in the nation, not to mention the thousands of other media outlets under their control).

This may be the worst two decades in communications history for preserving even a modicum of public interest in broadcast and other media ownership and operation. You have a legal and moral obligation not to erode this any further. In fact, reversing some rules on public service access and programming would serve the public even more.

As a broadcast veteran of over 40 years, I urge you to leave the cross-ownership rule alone.